

Determination of NEPA Adequacy (DNA) Worksheet

U.S. Department of the Interior
Bureau of Land Management

OFFICE: Stillwater Field Office, LLNVC01000

TRACKING NUMBER: DOI-BLM-NV-C010-2015-0034-DNA

CASEFILE/PROJECT NUMBER: N30-15-031 GS Geothermal Lease # NVN-086897 & 090744

PROPOSED ACTION TITLE/TYPE: Well 56-22 & 84-22 Tracer Test

LOCATION/LEGAL DESCRIPTION: MDM T. 21 N., R. 38 E., section 22

APPLICANT (if any): Ormat 43, LLC

A. Description of Proposed Action and any applicable mitigation measures

Ormat is proposing to perform a 29 day tracer test to measure the connection between well 56-22 and well 84-22 in the Tungsten geothermal system. To conduct the tracer test a temporary sump, located approximately 10 feet away from the existing sump at well 56-22, and measuring 10 feet by 20 feet with a depth of 10 feet would be constructed. This temporary sump would be lined with a water proof membrane and fenced to deter entry by wildlife, livestock, and people. To connect the two wells approximately 2,600 feet of temporary pipeline would be laid on the surface from well 56-22 to well 65-22 to well 84-22. Equipment used to conduct the tracer test would be set up at each well head upon the already existing pads. Once the tracer test is complete the test assembly would be "rigged-down", the temporary pipeline would be removed, and the temporary sump reclaimed.

B. Land Use Plan Conformance

LUP Name* NV - Carson City Date Approved: May 9, 2001
 RMP

**List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto)*

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:

MIN-1, Desired Outcomes, 1: Encourage development of energy and mineral resources in a timely manner to meet national, regional and local needs consistent with the objectives for other public land uses.

MIN-5, Standard Operating Procedures: Leasable Minerals, 5: Oil, gas, and geothermal exploration and production upon BLM land are conducted through leases with the Bureau and are subject to terms and stipulations to comply with all applicable federal and state laws pertaining to various considerations for sanitation, water quality, wildlife, safety, and reclamation. Stipulations may be site specific and are derived from the environmental analysis process.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

Carson City District Office — Ormat Technologies, Inc., Tungsten Mountain Geothermal Exploration Project, DOI-BLM-NV-C010-2012-0029-EA and FONSI/DR signed March 28, 2012.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

The proposed action is essentially similar to the types of actions analyzed and within the project area analyzed in the 2012 EA. While tracer tests are not specifically addressed the EA does consider the environmental consequences of individual aspects of the proposed action through its analysis of other types of geothermal exploration activities. Rigging-up equipment and excavating sumps was analyzed as part of well site preparation activities. Flowing a well for testing purposes was analyzed as part of drilling and testing operations.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource value?

Yes, environmental concerns, interests and resource values have not changed since the completions of the 2012 EA. The range of alternatives in the 2012 EA is still appropriate. The environmental constraints of geothermal exploration have not changes and the proposed action is essentially similar to those analyzed in the 2012 EA.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessments, recent endangered species listings, updated lists of BLM sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Anticipated impacts to resources have not changed and no new information or circumstances have been identified for the project area since the signing of the FONSI/DR on March 28, 2012. The proposed action will use previously constructed sites and existing access roads. The proposed action is essentially similar to — but on a smaller scale than — those analyzed in the 2012 EA.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?




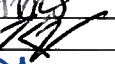

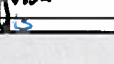
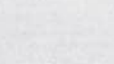
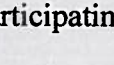


Yes, the 2012 EA analyzed cumulative impacts on relevant resources. The cumulative impacts to public lands resulting from geothermal exploration would remain unchanged. The proposed temporary sump would be constructed upon the already existing pad and the temporary pipeline would be laid above ground.

5. Are there public involvement and interagency reviews associated with existing NEPA document(s) adequate for the current proposed action?

Yes, the public involvement included in the 2012 EA is adequate considering the scope of the proposed action. The extent of the consultation conducted with other agencies and interested parties is described in that document

E. Persons/Agencies/BLM Staff Consulted

Table 1. List of Preparers

Name	Discipline	Signature
Linda Appel/Chelsy Simerson	Rangeland Management Specialist	 7/6/15
Angelica Rose	Planning & Environmental Coordinator	 7/6/15
Joel Hartmann/Ken Depaoli	Geologist	 7/6/15
Chris Kula	Wildlife Biologist	 7/6/15
Michelle Stropky	Hydrologist	 07/09/15
Ken Vicencio	Weed Coordinator	 7/6/15
David Schroeder	Environmental Protection Specialist	 7.6.15
Dan Westermeyer	Outdoor Recreation Planner	 7-6-15
Jason Wright/Kristen Bowen	Archaeologist	 7/9/15
Matt Simons	Realty Specialist	 7/6/15

Note

Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirement of NEPA.


Signature of Project Lead


Signature of NEPA Coordinator


Signature of the Responsible Official

7/10/2015
Date

Note:

The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.